

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

IN RE: Peter R Magrane

Case No. 19-20499

Chapter 13

Judge Opperman

Debtor(s)

**DEBTOR'S RESPONSE TO FREEDOME MORTGAGE CORPORATION'S MOTION
FOR LIFT OF STAY**

NOW COMES Debtor, by and through his attorney, Klimmek Law Office PLC, and in response to the motion of the Freedom Mortgage Corporation (herein "Creditor") states as follows:

1. Admit.
2. Admit
3. Neither admit nor deny.
4. Neither admit nor deny.
5. Admit.
6. Admit. However, Debtor is elderly and his finances are managed by his adult daughter. Debtor's adult daughter became involved in internet gambling and misappropriated Debtor's Chapter 13 plan payment funds. Debtor will resume Chapter 13 plan payments and file a plan modification to resolve any funding and feasibility issues.
7. Deny.
8. No response required.
9. No response required
10. Deny.
11. Deny.
12. Neither admit nor deny.

13. Admit.
14. No response required.
15. No response required.
16. No response required.
17. No response required
18. No response required.

WHEREFORE, Debtor prays that this Court deny the relief requested.

Respectfully submitted,

/s/ Tadd R. Klimmek
Klimmek Law Office PLC
Attorney for Debtor(s)
Tadd R. Klimmek P64616
503 N. Euclid Ave, Suite 6
Bay City, MI 48706
989-297-6967
mail@klimmeklawoffice.com

Date: 4/11/22

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

IN RE: Peter R Magrane

Debtor(s)

Case No. 19-20499

Chapter 13

Judge Opperman

PROOF OF SERVICE

Tadd R. Klimmek certifies that on 4/11/22, a copy of Debtor's Response to Freedom Mortgage Corporation's Motion for Lift of Stay and this Proof of Service were served upon the Creditor, Chapter 13 Trustee and US Trustee via ECF

Respectfully submitted,

/s/ Tadd R. Klimmek
Klimmek Law Office PLC
Attorney for Debtor(s)
Tadd R. Klimmek P64616
503 N. Euclid Ave, Suite 6
Bay City, MI 48706
989-297-6967
mail@klimmeklawoffice.com

Date: 4/11/22